

From: [Brett Sands](#)
To: [LeDoux, Erica](#)
Subject: Re: MCN - Meat Processing Plant Additional information
Date: Wednesday, December 1, 2021 4:13:34 PM
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[Emissions - measuring \(1\).docx](#)

Hello Ms. Erica,

I hope all is well with you. I have received the emissions estimations for the smokers that will be used at the looped Square Meat Processing Plant.

Please see the attached documentation.

Thank you very much,

Mr. Brett Sands

From: LeDoux, Erica <LeDoux.Erica@epa.gov>
Sent: Friday, October 15, 2021 1:33 PM
To: Brett Sands <brettsands@uscogeation.com>
Subject: RE: MCN - Meat Processing Plant Additional information

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Brett,

Sorry, one more thing

Please provide the manufacturer spec sheets for the smokers at the facility. I should include this information, along with the other documents you have submitted for the record.

Respectfully,

Erica G. LeDoux, Environmental Engineer
U.S. EPA Region 6
Air and Radiation Division Air Permits Section (ARPE)
1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.eric@epa.gov

This e-mail may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: LeDoux, Erica
Sent: Friday, October 15, 2021 1:28 PM
To: Brett Sands <brettsands@uscogeation.com>
Subject: RE: MCN - Meat Processing Plant Additional information


Hi Brett,

Thank you for the information.

Would you provide an estimate of the emissions for the smokers without controls to ensure that this part of your operation is not exceeding the minor NSR permitting thresholds (see below)? This may help you determine if you need to add pollution controls and what the potential emissions would be with additional controls. I'm assuming Mauting can provide you on emissions if these are off

the shelf smoker configurations. MCN need to come up with the emission estimates for all smoking operations, probably will include PM, VOCs, NOx, etc

TABLE 1 TO § 49.153—MINOR NSR THRESHOLDS ^A

 Regulated NSR pollutant	Minor NSR thresholds for nonattainment areas (tpy)	Minor NSR thresholds for attainment areas (tpy)
Carbon monoxide (CO)	5	10
Nitrogen oxides (NO _x)	5 ^b	10
Sulfur dioxide (SO ₂)	5	10
Volatile Organic Compounds (VOC)	2 ^b	5
PM	5	10
PM ₁₀	1	5
PM _{2.5}	0.6	3
Lead	0.1	0.1
Fluorides	NA	1
Sulfuric acid mist	NA	2
Hydrogen sulfide (H ₂ S)	NA	2
Total reduced sulfur (including H ₂ S)	NA	2
Reduced sulfur compounds (including H ₂ S)	NA	2
Municipal waste combustor emissions	NA	2
Municipal solid waste landfill emissions (measured as nonmethane organic compounds)	NA	10

^a If part of a Tribe's area of Indian country is designated as attainment and another part as nonattainment, the applicable threshold for a proposed source or modification is determined based on the designation where the source would be located. If the source straddles the two areas, the more stringent thresholds apply.

^b In extreme ozone nonattainment areas, section 182(e)(2) of the Act requires any change at a major source that results in any increase in emissions to be subject to major NSR permitting. In other words, any changes to existing major sources in extreme ozone nonattainment areas are subject to a "0" tpy threshold, but that threshold does not apply to minor sources.

Respectfully,

Erica G. LeDoux, Environmental Engineer
U.S. EPA Region 6
Air and Radiation Division Air Permits Section (ARPE)
1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.eric@epa.gov

This e-mail may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: Brett Sands <brettsands@muscogeenation.com>
Sent: Friday, October 15, 2021 12:20 PM
To: LeDoux, Erica <LeDoux.Erica@epa.gov>
Subject: Re: MCN - Meat Processing Plant Additional information

Ms. Erica,

The disposal of the animal carcasses will be handled by a rendering service (Valley Proteins) coming to get the majority of the carcasses, aside from the hide which we will have to haul off ourselves.

The Looped Square Meat Company will technically have three smokers all made by Mauting, One "one truck" smoker, One "two truck" smoker and One "four truck" smoker. They will essentially be in two locations, the single truck smoker will be on the deer side and the remaining two (two truck and four truck) will be in the smoker room on the south end of the building.

We will use real wood chips in these smokers.

We do not currently have scrubbers installed, but they can be added if necessary.

Respectfully,

Mr. Brett Sands

From: LeDoux, Erica <LeDoux.Erica@epa.gov>
Sent: Thursday, October 14, 2021 5:16 PM
To: Brett Sands <brettsands@muscogeenation.com>
Subject: RE: MCN - Meat Processing Plant Additional information

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Brett,

I have received some additional questions from Management your submission and letter is reviewed

- How will the disposal of the animal carcasses be handled?
- The electrical plan indicates two different smoking areas –
 - How many smokers will the facility have?
 - What is being used to smoke – hardwood, charcoal, pellet or liquid smoke?
 - Are scrubbers installed for the smoking areas

If you have any questions or concerns, please let me know . I am available to meet

Respectfully,

Erica G. LeDoux, Environmental Engineer
U.S. EPA Region 6
Air and Radiation Division Air Permits Section (ARPE)
1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.eric@epa.gov

This e-mail may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: LeDoux, Erica
Sent: Tuesday, September 28, 2021 1:25 PM
To: brettsands@muscogeenation.com
Cc: Kaleri, Cynthia <kaleri.cynthia@epa.gov>; Jeffrey Robinson <Robinson.Jeffrey@epa.gov>
Subject: RE: MCN - Meat Processing Plant Additional information

Hi Brett,

Good news! As I discussed with you last week, EPA was having a multi-regional Tribal NSR Coordinator meeting. This meeting was held yesterday. One of the topics discussed in the meeting is the manner in which EPA should respond to an applicant for sources that do not require a Tribal NSR Permit because the emission units at the source are exempted from the Tribal NSR program. The Muscogee Creek Nation is in the process of constructing a meat process facility on Muscogee Creek Tribal Nation lands at 3260 US HWY 75 Beggs, OK in Tulsa County. You provided information that indicates the only emission unit at the facility will be a 456 hp emergency generator engine used solely for electrical power for the facility during an outage. I have combined all of the documents you provided for this project. EPA Region 6 has started drafting a letter that will provide EPA's decision for the permit exemption according to 40 CFR § 49.153 (c)(9)(ii) for your records. This decision letter will be for air permitting purposes only.

Thank you, Erica

Erica G. LeDoux, Environmental Engineer
U.S. EPA Region 6
Air and Radiation Division Air Permits Section (ARPE)

1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.eric@epa.gov

This e-mail may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: LeDoux, Erica
Sent: Wednesday, September 15, 2021 10:29 AM
To: Brett Sands <brettsands@muscogeenation.com>
Subject: RE: MCN - Meat Processing Plant Additional information

Good Morning Brett,

I am doing well and hope you are too.

Thank you for this additional information. I will review and combine with the record for this facility's evaluation. I will get back with you.

Thank you, Erica

Erica G. LeDoux, Environmental Engineer
U.S. EPA Region 6
Air and Radiation Division Air Permits Section (ARPE)
1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.eric@epa.gov

This e-mail may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: Brett Sands <brettsands@muscogeenation.com>
Sent: Wednesday, September 15, 2021 9:59 AM
To: LeDoux, Erica <LeDoux.Erica@epa.gov>
Subject: Re: MCN - Meat Processing Plant Additional information

Good Morning Ms. Erica,

I hope you're doing well today. I reached out to Blue Star Power Systems, Inc., and they were able to send me emissions data for the generator engine. I also filled out the NSR Application (please see attachments).

Thank you and have a good day,

Mr. Sands

From: LeDoux, Erica <LeDoux.Erica@epa.gov>
Sent: Tuesday, September 14, 2021 11:56 AM
To: Brett Sands <brettsands@muscogeenation.com>
Subject: RE: MCN - Meat Processing Plant Additional information

Hi Brett,

I am acknowledging receipt and will combine this document with the others. Will you be sending the NSR application form to me after you finishing adding the Facility Manager contact info. Also, check the ESA and NHPA boxes, since you submitted this information in previous email and it will be included in the finish document record.

Would it be possible to contact the manufacturer for the emission factors for generator engine to see if they can provide? Although this engine is exempted, I will run the numbers in the emission calculator located online to include in the overall document record for this evaluation.

Thank you, Erica

Erica G. LeDoux, Environmental Engineer
U.S. EPA Region 6
Air and Radiation Division Air Permits Section (ARPE)
1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.eric@epa.gov

This e-mail may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: Brett Sands <brettsands@muscogeenation.com>
Sent: Tuesday, September 14, 2021 10:42 AM
To: LeDoux, Erica <LeDoux.Erica@epa.gov>
Subject: Re: MCN - Meat Processing Plant Additional information

Hi Erica,

I hope you are doing well today. I have attached the Narrative description of processes and the NSR Application. I could not find an emission factor for the Blue Star Power Systems stationary standby emergency generator.

Thank you and have a great day,

Mr. Sands

From: LeDoux, Erica <LeDoux.Erica@epa.gov>
Sent: Monday, September 13, 2021 5:39 PM
To: Brett Sands <brettsands@muscogeenation.com>
Subject: MCN - Meat Processing Plant Additional information

Hi Brett,

Another thing I thought of – Please make sure to include in the information for the generator engine that it is only for backup power for the facility and no pollution control device is used. Thank you, Erica

Thank you, Erica

Erica G. LeDoux, Environmental Engineer
U.S. EPA Region 6
Air and Radiation Division Air Permits Section (ARPE)
1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.eric@epa.gov

This e-mail may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: LeDoux, Erica
Sent: Monday, September 13, 2021 2:38 PM
To: brettsands@muscogeenation.com

Subject: MCN - Meat Processing Plant Additional information

Brett:

As discussed, please submit the NSR Application form that you have filled out with the general facility information that includes operator contact information, compliance contact, physical address, LAT and LONG, etc

Please use the following only as a template or example to follow for your facility process description. The facility process description should include a brief summary about the process (refer to your narrative and the information that we highlighted during our discussion). In your narrative please include information about the diesel storage i.e., size

1.0 NARRATIVE DESCRIPTION OF PROCESSES

The Choctaw Casino & Resort Pocola (Pocola Casino) is located at 3400 Choctaw Road, Pocola, LeFlore County, OK 74902. The Choctaw Nation of Oklahoma (CNO) is applying for an Air Quality Permit via the United States Environmental Protection Agency (USEPA) Federal Minor New Source Review Program in Indian Country for this gaming facility. The complex includes gaming tables and machines, hotel accommodations, restaurants, and entertainment venues. No manufacturing occurs onsite.

A process flow diagram is not necessary since the only processes contributing to the PTE for this site are emergency generators for backup power and standard commercial heating, cooking, and hot water/boiler units that are fired by natural gas.

2.0 AIR EMISSION SOURCES AND AIR POLLUTION CONTROL EQUIPMENT

Three onsite processes generate regulated air emissions as follows:

- Two diesel-powered emergency generators with a combined 5,116 hp which are engaged during a power shortage or outage.

City	Location	Make	Rated hp	Fuel Volume (gal)	Fuel	Model #	Serial #
Pocola	Casino	Caterpillar	2937	2500	Diesel	SR4B	7GM01155
Pocola	Casino	Cummins	2179	3000	Diesel	DQKAB-7540849	1110254496

Manufacturer’s emission certificates are provided in Appendix B.

Appendix A (Site Location Maps) contains a Site Location Map and Site Figure showing the approximate location of the emergency generators. The small heaters and boilers are too numerous and too small to clearly locate on the maps.

The emergency generators use low-sulfur diesel fuel, have certificates of conformity, and operate in compliance with the emission limits of 40 CFR 60:4205. Compliance with NSPS Subpart IIII demonstrates compliance with 40 CFR 63 Subpart ZZZZ.

The natural gas fired comfort heaters and water heaters use commercial grade natural gas. These devices are not subject to any 40 CFR 60 or 40 CFR 63 Subparts.

All emission sources are maintained in accordance with manufacturer recommendations and no unit specific air pollution control devices are utilized.

3.0 FUEL SOURCES

Both emergency generators use low-sulfur diesel with sulfur content less than 0.0015 PPMVW. All small heaters, boilers, and HVAC units use commercial grade natural gas.

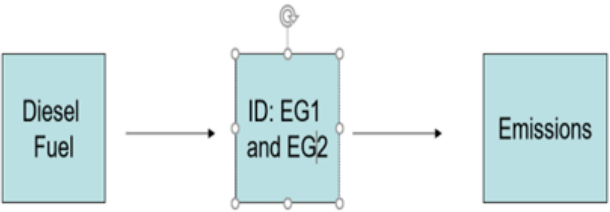
4.0 RAW MATERIALS

The Pocola Casino is not a manufacturing facility. The only raw materials used are low-sulfur diesel and commercial grade natural gas.

5.0 OPERATING SCHEDULE

The Pocola Casino operates continuously, 24 hours per day, 7 days per week, 52 weeks per year. Comfort heating and water heaters run as needed depending on season and daily demand.

A process flow sheet and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.



Also, if you can please submit the emission factors for the generator engine.

I will combine all of what you submitted into one document for the record.

Thank you, Erica

Erica G. LeDoux, Environmental Engineer
U.S. EPA Region 6
Air and Radiation Division Air Permits Section (ARPE)
1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.eric@epa.gov

This e-mail may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.